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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

PETER DELVECCHIA, *et al.*,

Plaintiffs,

Vs.

FRONTIER AIRLINES, INC., *et al.*,

Defendants.

Case No: 2:19-CV-01322-KJD-DJA

**MOTION TO EXTEND
TIME TO FILE RESPONSE TO
DEFENDANTS' MOTION FOR SUMMARY
JUDGMENT**

(FIRST REQUEST)

Plaintiffs, Peter DelVecchia individually and Peter DelVecchia as next friend of A. D., a minor ("A.D."), hereby submit this motion to extend time for Plaintiffs to respond to Defendants' Motion for Summary Judgment (ECF No. 266) pursuant to LR IA 6-1 an additional fourteen (14) days, up to and including November 30, 2023.

This request for an extension is not sought for any improper purpose such as delay or prejudice, but is sought due to conflicting deadlines in other matters for Plaintiffs' counsel, as well as the complex and fact-intensive nature of this matter.

**MOTION TO EXTEND TIME TO FILE RESPONSE TO DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

Nevada counsel for Plaintiff, Ms. McLetchie, was out of the jurisdiction for two (2) weeks in October, and suffered two illnesses which impaired her ability to perform legal work and necessitates an extension of the deadline. Thus, she has had limited time to assist Mr. McKay. Ms. McLetchie's associate, Mr. Wolpert, who planned to assist with the numerous ancillary matters related to the response such as the motions to seal, is also currently out of the jurisdiction until November 19, 2023, for family medical care, further impairing Plaintiffs' counsel's ability to meet the instant deadlines. Moreover, Mr. Wolpert is occupied today for urgent family medical appointments and has very limited availability¹. Further, technical issues involved in working with the numerous exhibits and across offices has impeded the ability of Plaintiffs' counsel to complete work relating to the response. The requested extension is not requested lightly, nor for the purposes of delay.² The extension will ensure compliance with local rules and the Protective Order, and allow for more concise briefing to be presented.

Plaintiffs respectfully request that this Court extend the time for the Plaintiffs to file their Response to Defendant's Motion for Summary Judgment (ECF No. 266) by fourteen (14) days from the current deadline of November 16, 2023 up to and including November 30, 2023.

DATED this 16th day of November, 2023.

By: /s/

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¹ McLetchie Law's paralegal just started work on November 13, 2023.

² To avoid unnecessary motion practice, Plaintiffs' counsel endeavored to obtain consent from counsel for Defendants and shared the reasons why a request was sought but Defendants' counsel refused to consider the request and claimed they lacked authority to grant a request.